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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

Dear Sir/Madam:

Your facility was recently inspected by an employee of the Department of Ecology. Attached is a copy of the resulting inspection report.

If you have questions regarding this report, please contact the appropriate inspector at (206) 649-7000.

Sincerely,

Carla J Skog

Carla J. Skog
Permit/Enforcement Coordinator
Water Quality Program
Northwest Regional Office

CJS:cs
Attachment

DEPARTMENT OF ECOLOGY

Inspection Report
for
ASH GROVE CEMENT WEST, INC.

Nov. 12, 1991

TO: Kevin Fitzpatrick KF 11/13/91
FROM: Gerald Shervey
INSPECTOR: Gerald Shervey
DATE OF VISIT: Oct. 21, 1991
PERMIT NO.: SWDP 5162
NEW INDUSTRY: No PERMIT EXPIRES: 10-26-89

TYPE OF INSPECTION

Permit Application_x_ Permit Renewal___
Compliance_x_ Complaint___ Enforcement___ Drop-In___

MAILING ADDRESS: 3801 E. Marginal Way S., Seattle, WA. 98058

PERSON CONTACTED: Daniel J. Peters - Plant Superintendent

FACILITY DESCRIPTION: This facility produces cement for concrete production. The plant occupies about 23 acres. Cement production ceased in 1987; the plant has been used as a distribution center for cement since then.

RECEIVING WATER: settling pond on site for storm water, cooling water, truck wash water, and discharge from Stoneway Concrete (adjacent business). The settling pond is fifty feet from the Duwamish River, subsurface flow to the Duwamish is assumed in SWDP 5162.

TYPE OF TREATMENT SYSTEM: Settling ponds for process water. Sanitary wastes to sanitary sewer (Metro)

OPERATION: Satisfactory_x__ Fair___ Unsatisfactory___

SUMMARY: I inspected plans and new construction at Ash Grove, and concluded that the design of the plant precludes contamination of discharge to surface waters by raw materials and cement. Process waste water will be discharged to the METRO sanitary system under a permit from that agency. I told the

Plant Superintendent that if the stormwater discharge from the plant meets state water quality standards, Ecology will cancel SWDP 5162.

INTRODUCTION: Dan Peters contacted me by phone on Oct. 17, 1991 to discuss permits for Ash Grove Cement. Ash Grove is building a new cement manufacturing plant at the E. Marginal Way site. Peters informed me that Ash Grove is going to fill its settling pond with earth in the next few months; he was notifying Ecology of a change in treatment facilities at the plant. Peters explained that the facility will discharge to the sanitary sewer and storm sewer in Seattle. Peters asked if Ash Grove will need a permit to discharge to a storm drain. I answered yes. Peters protested. He said that the storm water runoff from the new plant was similar to discharge from many unpermitted facilities. He also noted that the City of Seattle is required to obtain a storm water discharge permit, so Seattle should regulate Ash Grove. I responded that Seattle's storm water discharge permit would not be issued for about one year at least. I agreed to inspect Ash Grove and discuss permitting with Mr. Peters.

FACILITY HISTORY: Permitting of this facility dates back to 1965, at that time the site was permitted for Lone Star Industries. The permit was transferred to Ash Grove in 1984. The settling pond water and sediments were tested by 'Ecology and Environment, Inc.' and Ecology in 1987. The tests were reported to EPA; the report concludes "the probability of detecting hazardous contamination in the soil and/or ground water is low."

NARRATIVE: I entered the office for Ash Grove at 2:30 PM, introduced myself and presented credentials. Dan Peters met me after a short wait. Peters showed me construction plans for the facility and discussed disposal of effluent and storm water from the new manufacturing plant. After the discussion, Peters accompanied me while I inspected the grounds of the plant.

Stoneway Concrete leases about five acres of the Ash Grove facility; Stoneway discharges concrete wash water to the settling pond at Ash Grove. After the settling pond is filled, Stoneway will discharge to the sanitary sewer (METRO).

Peters described the manufacturing process for cement. Limestone, silica sand, iron, and clay are heated to 2500 degrees Far. to form klinker. Gypsum is added to retard setting of cement. During four months of the year coal is burned to produce heat and flyash. Ethylene glycol is added near the end of the process.

All raw materials except limestone will be stored under cover to minimize moisture content of the raw materials. Limestone will be stored in the open at the east side of the plant. Raw materials will be loaded pneumatically from barges. Raw

materials and the product are transported around the plant pneumatically. The final product is loaded pneumatically into haul trucks under cover (photo 1, 2).

I observed two sources of storm water contamination: a truck wash station (photo 4) and a 7500 gal. ethylene glycol tank (photo 3). The truck wash has no cover and discharges to the settling pond. Peters said the truck wash will be routed to the sanitary sewer. The ethylene glycol tank lacked containment and cover. Peters agreed to provide containment for the tank. I also asked Peters how cooling water would be discharged. He answered that cooling water would be recirculated. I asked if the water had to be changed after extended use or if the system leaked, where the cooling water would be discharged to. Peters admitted he did not know.

Photo 5 shows the frame for the clay storage building. Photos 6 and 7 show the settling pond.

After inspecting the site and the plans for Ash Grove's new manufacturing facility, I agreed with Peters that the design of the plant minimized the potential for storm water contamination by raw materials and product. In closing, I asked that Peters supply Ecology with a site plan for storm drain and sanitary sewer connections and an explanation of how cooling water would be discharged. I also asked him to find out if the storm water discharge was to a CSO.

I told Peters that based on the plans and my observations of the site, Ecology would be willing to cancel the waste discharge permit for Ash Grove after the new plant is on line, providing that testing of the storm water discharge shows that the discharge meets state water quality standards when it leaves the property. Peters accepted my proposal.

CONCLUSION: Peters sent me a drainage plan for the facility. The cover letter for the plan stated that the Seattle storm drain system is separate from the sanitary at the plant. Discharges from the cooling water system will be discharged to the sanitary sewer.

I discussed the settling pond closure with Dan Cargill in Toxic Cleanup. He asked that the facility test the sediment in the settling pond for metals content. I relayed the request to Dan Peters, he agreed.

APPENDIX: List of appendix contents.

fn:agcw1091.inr

DEPARTMENT OF ECOLOGY
INSPECTION REPORT

To: Kevin Fitzpatrick, File KF 6/30/94
Inspector: Ken White
Visit Date: 6-27-94

Permit No. ST5162
Permit Expired: 10-26-89
New Industry: No

Type of Inspection: Announced WQ inspection to confirm connection to METRO and zero discharge of any non-contact cooling water (recycled) for purposes of canceling Permit No. ST5162.

Permit Application	___	Complaint	___	Permit Cancelation	_X_
Permit Renewal	___	Enforcement	___		
Permit Compliance	___	Drop-in	___		

Facility: Ash Grove Cement Company
3801 E. Marginal Way South City: Seattle, WA 98134

County: King

Person Contacted: Gerald J. Brown, Safety/Environmental Manager (206) 623-5596.

Type of Facility: Cement Manufacturing Plant

Receiving Water: METRO sanitary sewer

Type of Treatment: Non-contact cooling water is recycled with zero discharge and all other waters including surface waters are discharged to METRO.

Operation: Satisfactory

Complies with permit condition: N/A

Discription:

This was an announced WQ inspection to verify that Ash Grove had covered over their old sedimentation pond with concrete and had appropriately connected to the METRO sanitary collection system.

I arrived on site at 1:30 pm, signed in and was immediately met by Gerald J. Brown, Safety/Evironmental Manager. We proceeded to tour the plant. We first went to the location where the sedimentation pond had once been located. According to Gerald the pond was filled in about two years ago and covered with concrete. Photographs were taken of the

location where the pond once exsisted.

In an Inspection Report prepared by Permit Manager Gerald Shervey dated November 12, 1992 (copy attached), Gerald S. had stated that Ecology would cancel SWDP 5162 if the stormwater discharge from the plant met state water quality standards. By connecting to METRO it appears that Ash Grove has satisfied those requirements. Dan Cargill in Toxic Ceanup was also contacted regarding this facility.

CONCLUSION:

From what Gerald J. Brown explained to me during the inspection, what was visibally observed and Ecology's Gerald Shervey's two year old recommendation to cancel the permit; I recommend the cancelation of SWDP5162.

Photographs were taken and I left the facility at 2:15 pm.

Ken White 6-27-94
Ken White

cc: Lisa Zinner
Attachment

S1. EFFLUENT LIMITATIONS

Upon issuance of this permit and lasting until the expiration date, the permittee is authorized to discharge to the Duwamish River and Ground Water subject to the following conditions:

a. Flow shall not exceed 214,100 gallons per day.

b. All contaminated waters are to be collected and used as process water or discharged to the surge pond to enter the Duwamish River via sub-surface seepage.

c. The discharge to state waters must have the following characteristics:

1. pH range between 6.5 and 8.5;

2. No visible oils;

3. Turbidity shall not exceed 10 JTU over natural conditions in the Duwamish River.

S2. OPERATION AND MAINTAINENCE

The pier shall be maintained to minimize spillage from loading and off loading operations.

a. Materials spilled on the loading pier shall be swept or otherwise physically removed from the area to prevent this material from entering the surface waters of the state.

b. Hydraulic cleaning of this area shall not be permitted unless materials are of a nature that endanger human life or property.

GENERAL CONDITIONS

G1. All discharges and activities authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant more frequently than or at a level in excess of that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit.

G2. Any anticipated facility expansion, production increase or process modification which will result in a new or increased discharge of pollutants must be reported to the Department by submission of a new application or supplement thereto; or, if such discharge will not violate effluent limitations specified herein, by submission to the Department a notice of such new or increased discharge.

G3. The diversion or bypass of any discharge from facilities utilized by the permittee to maintain compliance with the terms and conditions of this permit is prohibited, except (a) where unavoidable to prevent loss of life or severe property damage, or (b) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the terms and conditions of this permit. The permittee shall immediately notify the Department in writing of each such diversion or bypass in accordance with the procedure specified in Condition G4.

G4. In the event, the permittee is unable to comply with any of the conditions of this permit because of a breakdown of equipment or facilities, an accident caused by human error or negligence, or any other cause, such as an act of nature, the permittee shall:

a. Immediately take action to stop, contain, and clean up the unauthorized discharges and correct the problem.

b. Immediately notify the Department so that an investigation can be made to evaluate the impact and the corrective actions taken and determine additional action that must be taken.

c. Submit a detailed written report to the Department describing the breakdown, the actual quantity and quality of resulting waste discharges, corrective action taken, steps taken to prevent a recurrence, and any other pertinent information.

Compliance with these requirements does not relieve the permittee from responsibility to maintain continuous compliance with the conditions of this permit or the resulting liability for failure to comply.

G5. The permittee shall at all times maintain in good working order and efficiently operate all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

G6. After notice and opportunity for a hearing, this permit may be modified, suspended or revoked in whole or in part during its term for cause including, but not limited to the following:

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;

c. A change in the condition of the receiving waters or any other condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

G7. The permittee shall, at all reasonable times, allow authorized representatives of the Department:

a. To enter upon the permittee's premises for the purpose of inspecting and investigating condition relating to the pollution of, or possible pollution of, any of the waters of the state, or for the purpose of investigating compliance with any of the terms of this permit;

b. To have access to and copy and records required to be kept under the terms and conditions of this permit;

c. To inspect any monitoring equipment or monitoring method required by this permit; or,

d. To sample any discharge of pollutants.

G8. If a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307 (a) of the Federal Act for a toxic pollutant which is present in the discharge authorized herein and such standard or prohibition is more stringent than any limitation upon such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee shall be so notified. Section 307 (a) requires that the Administrator of the Environmental Protection Agency shall promulgate effluent standards (or prohibition) for toxic pollutants which he has listed as such.

G9. Nothing in this permit shall be construed as excusing the permittee from compliance with any applicable Federal, State, or local statutes, ordinances, or regulations.

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

RECEIVED 1-27-84

REDMOND ENVIRONMENTAL LABORATORY 206-885-1900

DATA SUMMARY

ORIGINAL TO: LAB FILES

COPIES TO: B Smith

SOURCE Lonestar Cement/King Co. PROGRAM NUMBER 4,4,4

DATE SAMPLED 12/14/83 DATE RECEIVED 12/14/1983 COLLECTED BY B. Smith

Sample (Log) Number	Standard Deviation ±%		2324-A2		2324-A3		AC		
Station:			Pond		Truck Wash				
pH (units)	10		10.8		11.2				
Turbidity (NTU)	10		225.		110.				
Sp. Conductivity (umhos/cm) @ 25°C	10		424.		507.				
COD									
BOD (5 day)									
Fecal Coliform (Col./100 ml)									
Chloride as Cl									
Sulfate as SO_4									
Total Hardness as $CaCO_3$			120.		160.				
Total Organic Carbon (TOC)									
Total Solids									
Total Non Vol. Solids									
Total Suspended Solids									
Total Dissolved Solids									

NOTE: All results are reported as mg/L(ppm) unless otherwise specified.
" < " is "less than" and " > " is "greater than"
est = estimate

PERMIT COPY

2/208 SUMMARIZED BY Miles M. Kuntz DATE 12-21-83

REVIEWED BY [signature] DATE 12/22/83

AGC2H000479

State of Washington
Department of Ecology

ENVIRONMENTAL LABORATORY DATA SUMMARY METALS

ORIGINAL TO: LAB FILES
COPIES TO: G. BRUGGER

SOURCE LONE STAR CEMENT PROGRAM NUMBER 444

DATE COLLECTED 12/14/83 RECEIVED 12/14/83 COLLECTED BY B. SMITH

Sample (Log) Number	Units	Standard Deviation ± %	POND 232	Truck Wash 232			CHROMIC		Acute	
Station:			442	443						
Cu - TOTAL	mg/L	10	0.10	0.02			.0056			
Zn - TOTAL	"	"	0.13	0.13						
Fe - TOTAL	"	"	2.3	0.50						
Ni										
Cr - TOTAL	"	"	0.35	<0.02						
Cd										
Pb - TOTAL	"	"	0.56	0.12						
Mn										

NOTE: Dissolved Metals: Those that will pass through a 0.45 μ membrane filter
Suspended Metals: Those retained by a 0.45 μ membrane filter
Total Metals: Those found in the unfiltered, rigorously acid digested sample
mg/L= ppm = μg/ml
μg/L= ppb = ng/ml
mg/kg = ppm - μg/gm
μg/kg = ppb = ng/gm
"<" is "less than" and ">" is "greater than"

ECY 070-2-32 (a)
Rev. 8/81

SUMMARIZED BY Gary D. Bruno DATE 1/4/84